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Counsel for RBC Distribution, LLC

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re DIAGNOSTICS RESEARCH
CORPORATION,

Debtor.

Case No.: 14-15195-abl

Chapter 11

**EX PARTE APPLICATION FOR
EXAMINATION OF JOSEPH HARRIS
PURSUANT TO FED. R. BANKR. P. 2004**

Examination Date: October 7, 2014

Examination Time: 9:00 a.m.

**Location: McDonald Carano Wilson 2300
West Sahara Avenue
Suite 1200
Las Vegas, Nevada 89102**

Pursuant to Federal Rule of Bankruptcy Procedure (“Fed. R. Bankr. P.”) 2004 and Local Rule of Bankruptcy Procedure (“LR”) 2004, RBC Distribution, LLC (“RBC”), by and through its counsel, McDonald Carano Wilson LLP, respectfully requests that the Court order the examination of Joseph Harris (the “Harris”), a purported secured creditor of Diagnostics Research Corporation (the “Debtor”), at the law offices of McDonald Carano Wilson LLP, 2300 West Sahara Avenue, Suite 1200, Las Vegas, Nevada 89102, on October 7, 2014 at 9:00 a.m. Pacific Time, which is more than 14-days from the date of this Application.

Pursuant to Fed. R. Bankr. P. 2004, on a motion of any party in interest, the Court may order the examination of any person or entity in order to evaluate the debtor’s financial

1 condition, conduct, property, liabilities, matters affecting the administration of the debtor's
2 estate and for any other purpose allowed under Fed. R. Bankr. P. 2004.

3 RBC requests a 2004 examination to learn about, *inter alia*, Harris' claims against the
4 Debtor, his alleged security interest in the Debtor's assets and the circumstances surrounding
5 such transactions. RBC will provide notice of this examination to all creditors so that all may
6 attend and ask questions.

7 RBC will secure attendance of Harris in accordance with LR 9016 and Fed. R. Bankr. P.
8 9016.

9 WHEREFORE, RBC requests entry of the proposed Order, uploaded concurrently
10 herewith, authorizing and directing the examination of Joseph Harris, and granting such other
11 relief as the Court deems just and equitable under the circumstances.

12 RESPECTFULLY SUBMITTED this 18th day of September 2014.

13 **MCDONALD CARANO WILSON LLP**

14 By /s/ Amanda M. Perach

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